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Attorneys for Defendants
 Wal-Mart Stores, Inc. (erroneously sued as
 “Wal-Mart”) and General Electric Company
 (erroneously sued as “General Electric”)

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

Indiezone, Inc., a Delaware corporation, and
 EoBuy, Limited an Irish private limited
 company,

Plaintiffs,

vs.

Todd Rooke, Joe Rogness, Phil Hazel, Sam
 Ashkar, Holly Oliver and U.S. Bank, collectively
 the ***RICO Defendants***;

Jingit LLC., Jingit Holdings LLC., Jingit
 Financial Services LLC., Music.Me, LLC, Tony
 Abena, John E. Fleming, Dan Frawley, Dave
 Moorehouse II, Chris Ohlsen, Justin James,
 Shannon Davis, Chris Karls in their capacities as
 officers, agents and/or employees of the Jingit
 LLC.,
Defendants in Negligence, and Aiding/Abetting;

Wal-Mart, General Electric, Target, DOE(s) and
 ROE(s) 1 through 10, ***Defendants in Negligence
 Secondary-Vicarious Infringement***,

Defendants.

Case No.: 3:13-cv-04280-VC

**DEFENDANTS WAL-MART STORES,
 INC. AND GENERAL ELECTRIC
 COMPANY’S STATEMENT REGARDING
 DEFENDANTS’ SUPPLEMENTAL BRIEF
 FOR SANCTIONS**

Compl. Filed: September 16, 2013

Honorable Vince Chhabria

Defendants Wal-Mart Stores, Inc. (erroneously sued as “Wal-Mart”) and General Electric Company (erroneously sued as “General Electric”) (collectively, the “Retailer Defendants”) respectfully state and submit to the Court and all parties that, regarding the Jingit Defendants’¹ Supplemental Brief for Sanctions (the “Supplemental Brief”) (*see* Dkt. Nos. 139-40), the Retailer Defendants have closely followed the sanctions proceedings, filed joinders on the underlying substantive motions and all related papers/pleadings before the Court (*see* Dkt. Nos. 74, 98), and counsel for the Retailer Defendants attended the underlying hearing at which the fraudulent statements and arguments were made. For these reasons, in addition to the reasons articulated by the Jingit Defendants in the Supplemental Brief, the Retailer Defendants should be the beneficiaries of any dismissal ordered by the Court.

DATED: August 13, 2014

REED SMITH LLP

By /s/ Robert N. Phillips

Robert N. Phillips (SBN 120970)

Paulo L. Sousa (SBN 288705)

Attorneys for Defendants

Wal-Mart Stores, Inc. and General Electric Company

¹ The “Jingit Defendants” consist of Jingit LLC; Jingit Holdings, LLC; Jingit Financial Services, LLC; Todd Rooke; Joe Rogness; Phil Hazel; Sam Ashkar, Holly Oliver; Shannon Davis; Justin James; Chris Ohlsen; Dan Frawley; Dave Moorehouse, II; Tony Abena; Chris Karls; John E. Fleming; and Music.Me, LLC.